

REMARKS

In the application claims 1, 4-18, and 20-45 remain pending and presently stand rejected. Various of the claims have been amended to further clarify what is regarded as the invention. Support for the amendments is found in the specification and figures as originally filed. No new matter has been added.

The reconsideration of the rejection of the claims is respectfully requested.

In the Office Action, pending claims 1, 4-18, and 20-45 were rejected under 35 U.S.C. § 103 as being rendered obvious over Abdel-Malek (U.S. Patent No. 6,959,235) in view of Yang (U.S. Publication No. 2001/0034673). In response to this rejection it is respectfully submitted that neither Abdel-Malek nor Yang (whether considered alone or in combination) disclose, teach, or suggest the elements set forth in the claims when the claims are considered “as a whole,” i.e., considering each and every word. For this reason it is respectfully submitted that the rejection under 35 U.S.C. § 103 must be withdrawn.

Turning first to Abdel-Malek, it has been acknowledged that Abdel-Malek fails to disclose, teach, or suggest the claimed using intelligent agents/computer instructions to move each of one or more physical items specified in an advance demand notice/work order (i.e., using information extracted from a work order within a customer maintenance system) to a respective one of a plurality of geographic locations within a supply chain as a function of a probability that each of the one or more physical items specified in the scheduled maintenance activity/work order will be needed to effect a repair procedure that is in keeping with the scheduled maintenance activity/work order from which the information was extracted in the first instance.

Rather than disclose a system such as the one that is claimed, i.e., one which functions to move within a supply chain items specified in a work order considering a probability that the

items specified in the work order will actually be needed for use in the performance of a repair procedure that is in keeping with the work order, Abdel-Malek discloses a system in which a parts-ordering module (58) provides inventory *consumption* recording so that inventory can be shipped from a supplier to maintain inventory above predetermined thresholds which have been established to ensure that parts *which may (or may never) be required* for maintenance activities *which may (or may never) arise* will be available in inventory. Thus, in Abdel-Malek, items are moved to locations within the supply chain not in response to a work order/scheduled maintenance activity being entered into/changed within a customer service system as is generally claimed but in response to items actually being used/consumed during a repair procedure and, thereafter, if the use/consumption of the items caused inventory to fall below the predetermined thresholds.

Considering now Yang, it is respectfully submitted that Yang fails to include any disclosure that might be said to suggest modifying Abdel-Malek to arrive at the invention claimed. In particular, Yang does nothing more than suggest a method by which Abdel-Malek may establish the predetermined thresholds at which inventory levels are to be maintained. In this regard, Yang discloses the desirability of using a long term forecast to anticipate needs for parts to thereby establish inventory thresholds at various nodes within a supply chain in hopes of avoiding excess inventories of certain parts and no availability of others. Thus, while the disclosure within Yang might be said to *supplement* the disclosure within Abdel-Malek, i.e., Yang discloses a method for creating the predetermined inventory thresholds utilized by Abdel-Malek to move items within the supply chain after items have been used/consumed during a repair procedure, it is evident that nothing from within Yang can be said to suggest *modifying* Abdel-Malek to arrive at a system which generally moves items within the supply chain in

response to a work order/scheduled maintenance activity being entered into a customer maintenance system or, more particularly, to arrive at a system which moves the items specified within the work order entered into the consumer maintenance system considering a probability that the items will be needed for use in a repair procedure.

In sum, it is respectfully submitted that, when Abdel-Malek and Yang are fully and fairly considered in their entirety, neither Abdel-Malek nor Yang, whether considered alone or in combination, can be said to disclose each and every element set forth in the claims and, furthermore, that nothing from within Yang can be said to suggest modifying Abdel-Malek to arrive at the invention claimed. For these reasons, it is respectfully submitted that the combination of Abdel-Malek cannot be said to support a *prima facie* case of obviousness and it is respectfully requested that the rejection of the claims be withdrawn.

CONCLUSION

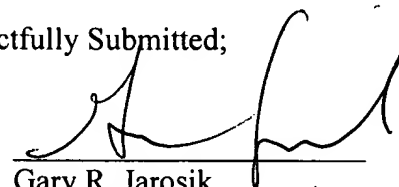
It is respectfully submitted that the application is in good and proper form for allowance. Such action of the part of the Examiner is respectfully requested. Should it be determined, however, that a telephone conference would expedite the prosecution of the subject application, the Examiner is respectfully requested to contact the attorney undersigned.

The Commissioner is authorized to charge any fee deficiency or credit overpayment to deposit account 50-2428 in the name of Greenberg Traurig.

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Respectfully Submitted;

By:


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